

Message

From: Dawson, Jeffrey [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B7281288675C408D9667266072F0AE21-JEFFREY DAWSON]
Sent: 5/25/2021 5:50:01 PM
To: Leifer, Kerry [Leifer.Kerry@epa.gov]
Subject: RE: follow up from a CLA/RISE call

Thanks Kerry

Very helpful.

Jeff

Jeffrey L Dawson
Senior Science Advisor
Immediate Office
U.S. EPA, Office of Chemical Safety and Pollution Prevention
1200 Pennsylvania Ave NW (7101M)
Washington, DC. 20004
703-305-7329
Email: dawson.jeff@epa.gov
Deliveries: 1201 Constitution Ave NW, Washington, DC 20004

From: Leifer, Kerry <Leifer.Kerry@epa.gov>
Sent: Tuesday, May 25, 2021 1:49 PM
To: Dawson, Jeffrey <Dawson.Jeff@epa.gov>
Subject: RE: follow up from a CLA/RISE call

Hi Jeff,

Yes, in looking at Tony's reports and the OPPT working PFAS definition, there were three active ingredients that have a structure consistent with the OPPT working PFAS definition: Flubendiamide, Pyrifluquinazon, and Broflanilide.

There are no inert ingredient with defined structures that meet the OPPT definition. I am still checking on a few inerts that are considered chemical substances of unknown or variable composition (UVCB substances) cannot be represented by unique structures and molecular formulas but that may meet the OPPT criteria.

Kerry

Kerry Leifer, Chief
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460
tel: (703) 308-8811

fax: (703) 605-0781

e-mail: leifer.kerry@epa.gov

From: Dawson, Jeffrey
Sent: Tuesday, May 25, 2021 1:30 PM
To: Leifer, Kerry <Leifer.Kerry@epa.gov>
Subject: follow up from a CLA/RISE call

Kerry,

Today in a call with CLA/RISE the issue came up of the PFAS definition. In the files you sent me earlier Tony Williams had pulled from the Comptox dashboard lists of pesticides that could meet varying definitions CF2 including CF3, CF3 substructure for inerts and actives.

Have you ever reconciled the information he gave you with the definition that we are relying on from OPPT available at: <https://www.epa.gov/pesticides/pfas-packaging>

OPPT applies the following "working definition" when identifying PFAS on the TSCA Inventory: a structure that contains the unit R-CF2-CF(R')(R''), where R, R', and R'' do not equal "H" and the carbon-carbon bond is saturated (note: branching, heteroatoms, and cyclic structures are included).

Thanks

Jeff

Jeffrey L Dawson
Senior Science Advisor
Immediate Office
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Deliveries: 1201 Constitution Ave NW, Washington, DC 20004